1 2 3 4	BOERSCH SHAPIRO LLP Lara Kollios (State Bar No. 235395) Lkollios@boerschshapiro.com 1611 Telegraph Ave., Ste. 806 Oakland, CA 94612 Telephone: (415) 500-6640	
5	Attorney for Defendant Jose Sotomayor	
6	UNITED STATES DISTRICT COURT	
7		
8	NORTHERN DISTRICT OF CALIFORNIA	
9		
10	UNITED STATES OF AMERICA,	Case No. 18-CR-00483-SI-2
11 12	Plaintiff, v.	MOTION TO WITHDRAW AND FOR SUBSTITUTION OF COUNSEL
13	JOSE SOTOMAYOR,	
14	Defendant.	
15		
16	Lara Kollios respectfully moves to withdraw as counsel of record for Jose Sotomayor and for	
17	substitution of Christopher J. Cannon, a fellow member of the Criminal Justice Act Panel. This	
18	motion is based on the fact that Ms. Kollios is leaving private practice.	
19	Pursuant to 18 U.S.C. § 3006A(c), "[t]he United States Magistrate or the court may, in the	
20	interests of justice, substitute one appointed counsel for another at any stage of the proceedings."	
21	Given Ms. Kollios's departure from private practice and the constitutional importance of Mr.	
22	Sotomayor's right to counsel, undersigned counsel respectfully moves to withdraw as counsel of	
23	record. Undersigned counsel understands that Mr. Cannon, a fellow member of the Criminal Justice	
24	Act Panel, has agreed to substitute in as counsel of record.	
25	For the foregoing reasons, counsel respectfully requests that this Court grant Ms. Kollios's	
26	motion to withdraw and appoint Mr. Cannon to represent Mr. Sotomayor in any and all further	
27	proceedings.	

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MOTION TO WITHDRAW AND FOR SUBSTITUTION OF COUNSEL Case No.: 18-CR-00483-SI-2

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1	All pleadings, orders and notices should henceforth be served upon the following substituted		
2	counsel for Defendant Jose Sotomayor:		
3	Christopher J. Cannon (State Bar No. 88034)		
4	Chris@SugarmanandCannon.com Sugarman & Cannon		
5	737 Tehama Street, #3 San Francisco CA 94103		
6	Telephone: (415) 362-6252		
7	Dated: March 21, 2019  BOERSCH SHAPIRO LLP		
8	_/s/Lara Kollios		
9	Lara Kollios		
10	Attorney for Jose Sotomayor		
11	Dated: March 21, 2019 SUGARMAN & CANNON		
12	_/s/Christopher J. Cannon		
13	Christopher J. Cannon		
14			
15			
16	[PROPOSED] ORDER		
17	Having reviewed the foregoing Motion to Withdraw and For Substitution of Counsel and		
18	good cause having been shown, IT IS HEREBY ORDERED that Lara Kollios is withdrawn as		
19	counsel of record.		
20	IT IS FURTHER ORDERED that Christopher J. Cannon is appointed as new counsel of		
21	record under the Criminal Justice Act.		
22	IT IS SO ORDERED.		
23			
24	Dated: March, 2019		
25	HONORABLE SUSAN ILLSTON United States District Court Judge		
26			
27			
28	2 MOTION TO WITHDRAW AND FOR		

MOTION TO WITHDRAW AND FOR SUBSTITUTION OF COUNSEL Case No.: 18-CR-00483-SI-2